

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID J. CATANZARO	:	
Plaintiff	:	Jury Trial Demanded
	:	
vs.	:	(Honorable Judge
	:	Malachy E. Mannion)
WALMART STORES, INC., et al.	:	
Defendants	:	No. 3:22-CV-1768

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**DEFENDANT CURRENT MEDIA GROUP LLC’S UNOPPOSED MOTION  
FOR THIRD EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S  
THIRD AMENDED COMPLAINT (ECF NO. 23)**

Defendant Current Media Group LLC<sup>1</sup> (“CMG” or “Defendant”), by and through their undersigned counsel, hereby files this Motion for Third Extension of Time to move, answer, or otherwise respond to the Third Amended Complaint (ECF No. 23) (“Complaint”) of David J. Catanzaro (“Plaintiff” or “Catanzaro”). In support of this Motion, Defendant states as follows:

1. On January 6, 2023, Plaintiff filed a Complaint alleging, *inter alia*, that Defendant infringes U.S. Patent No. 7,653,959.

2. Plaintiff served the Complaint on Defendant on June 14, 2023.

Accordingly, Defendant’s motion, answer, or other response to the Complaint was due on July 5, 2023.

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<sup>1</sup> The Complaint incorrectly names Current Media Group Inc.

3. On June 30, 2023, Defendant requested, and Plaintiff agreed to an extension of 30 days until and including August 4, 2023, for Defendant to move, answer, or otherwise respond to the Complaint.

4. On July 6, 2023 by Court Order (Doc. 37) the extension of time was granted to August 4, 2023.

5. The parties are currently in the process of exploring the possibility of resolving this matter without further Court intervention.

6. Accordingly, Defendant requested, and Plaintiff agreed to a second extension of 30 days until and including September 3, 2023, for Defendant to move, answer, or otherwise respond to the Complaint.

7. On August 9, 2023 by Court Order (Doc. 64) the extension of time was granted to September 3, 2023.

8. The parties have reached an agreement in principle to resolve the matter without further Court intervention.

9. Accordingly, Defendant requested, and Plaintiff agreed to a third extension of 30 days until and including October 3, 2023, for Defendant to move, answer, or otherwise respond to the Complaint. Defendant therefore files this Motion unopposed.

10. No Scheduling Order has been entered in this case and no deadlines have been set.

Accordingly, Defendant, Current Media Group LLC, respectfully requests that the Court grant this unopposed Motion and extend the deadline for Defendant to move, answer, or otherwise respond to the Complaint up to and including October 3, 2023.

RESPECTFULLY SUBMITTED,

MAIER & MAIER PLLC

Date: September 1, 2023

By: /s/Sid V. Pandit, Esq.

J. Timothy Hinton, Jr., Esq.

PA ID No. 61981

1401 Monroe Ave, Suite 2

Dunmore, PA 18509

(570) 344-9845

[timhinton@haggertylaw.net](mailto:timhinton@haggertylaw.net)

Siddhesh V. Pandit, Esq. (pro hac vice)

Timothy J. Maier, Esq. (pro hac vice)

Maier & Maier PLLC

345 S. Patric Street

Alexandria, VA 22314

(703) 740-8322

[svp@maierandmaier.com](mailto:svp@maierandmaier.com)

[tjm@maierandmaier.com](mailto:tjm@maierandmaier.com)

Attorneys for Defendant,  
Current Media Group LLC

**CERTIFICATE OF SERVICE**

I, Sid V. Pandit, Esquire, here by certify that I have served a true and correct copy of the foregoing Motion for Third Extension of Time to move, answer, or otherwise respond to the Third Amended Complaint by the court's Electronic Filing System and as follows:

David J. Catanzaro  
286 Upper Powderly Street  
Carbondale, PA 18407  
*Pro Se*

RESPECTFULLY SUBMITTED,

MAIER & MAIER PLLC

Date: September 1, 2023

By: /s/Sid V. Pandit, Esq.

J. Timothy Hinton, Jr., Esq.  
PA ID No. 61981  
1401 Monroe Ave, Suite 2  
Dunmore, PA 18509  
(570) 344-9845  
[timhinton@haggertylaw.net](mailto:timhinton@haggertylaw.net)

Siddhesh V. Pandit, Esq. (pro hac vice)  
Timothy J. Maier, Esq. (pro hac vice)  
Maier & Maier PLLC  
345 S. Patric Street  
Alexandria, VA 22314  
(703) 740-8322  
[svp@maierandmaier.com](mailto:svp@maierandmaier.com)  
[tjm@maierandmaier.com](mailto:tjm@maierandmaier.com)

Attorneys for Defendant,  
Current Media Group LLC